80 Pine Street, 38th Floor New York, New York 10005 T. 212.532.1116 F. 212.532.1176

New Jersey Office 576 Main Street, Suite C Chatham, New Jersey 07928

JOHN ELEFTERAKIS* NICHOLAS ELEFTERAKIS RAYMOND PANEK

OLIVER R. TOBIAS JEFFREY B. BROMFELD FAIZAN GHAZNAVI GABRIEL P. HARVIS BAREE N. FETT STEPHEN KAHN EVAN M. LA PENNA

KRISTEN PERRY – CONIGLIARO
AIKA DANAYEVA
ARIANA ELEFTERAKIS
MICHAEL INDELICATO
MICHAEL MARRON
DOMINICK MINGIONE
MARK NEWMAN
AGGELIKI E. NIKOLAIDIS
JOSEPH PERRY
MARIE LOUISE PRIOLO *
KEYONTE SUTHERLAND
WAYNE WATTLEY

*Also Admitted In New Jersey

ELEFTERAKIS ELEFTERAKIS & PANEK

September 22, 2020

BY ECF

Honorable James Orenstein United States Magistrate Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Galloway v. County of Nassau, et al., 19 CV 5026 (AMD) (JO)

Your Honor:

I represent plaintiff in the above-referenced matter. I write on behalf of the parties to respectfully provide a status report in accordance with the Court's order dated April 2, 2020 and in advance of the status conference on September 24, 2020 at 9:30 a.m.

The parties have exchanged discovery responses and over 15,000 pages of records. Plaintiff has deposed two witnesses involved in the Nassau County District Attorney's re-investigation of his conviction and defendants are deposing plaintiff today. The parties have agreed on a deposition schedule for the remaining party and non-party fact witnesses in compliance with the governing scheduling order.

Thank you for your attention to this matter.

Respectfully submitted,

Gabriel P. Harvis

cc: Defense Counsel